

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

HAMZA ALTAF KHWAJA

Case No. 1:24-MJ-565

MOTION FOR PARTIAL SEALING

NOW COMES the United States of America, by Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, through her assistant, JoAnna G. McFadden, and respectfully moves this Honorable Court to partially seal the criminal complaint affidavit (as identified in the supplement to this motion) and completely seal the supplement to this motion in this matter. Such sealing is within the inherent power of the court to control papers filed with it. *See, e.g., Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 64 (4th Cir. 1989). In support whereof, the government shows unto the court the following:

- (1) The criminal complaint affidavit describes aspects of cooperation.
- (2) Therefore, disclosure of the contents of the criminal complaint affidavit and the supplement to this motion may have a significant negative impact on the effectiveness the investigation and/or the safety of potential witnesses.

WHEREFORE, the government respectfully moves that this Honorable Court partially seal the criminal complaint affidavit and entirely seal the supplement to this motion until further order of the Court.

This the 1st day of January, 2025.

Respectfully submitted,

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